

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Antimicrobials Division (AD)

June 2, 2014

DP BARCODE: 419552
MRID: 49346300 and 49346301
SUBJECT: Coal Tar Creosote P2
REG. NO.: 61470-3
DOCUMENT TYPE: Product Chemistry Review
Manufacturing-use [] OR End-use Product [X]

INGREDIENTS:

<u>PC Code(s)</u>	<u>CAS Number</u>	<u>Active Ingredient:</u>
025004	80001-59-9	Coal Tar Creosote

TEST LAB: NA
SUBMITTER: Technology Sciences Group Inc.
GUIDELINE: Product Chemistry
ORGANIZATION: AD\PSB\CTT
REVIEWER: Lynette T. Umez-Eronini
APPROVED BY: Karen P. Hicks
APPROVED DATE: June 2, 2014
COMMENT: This product is for non-food use.

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MEMORANDUM

SUBJECT: Product Chemistry Review for EPA Reg. 61470-3
Product Name: Coal Tar Creosote P2
DP Barcode: 419552

FROM: Lynette T. Umez-Eronini, Chemist *Lynette T. Umez-Eronini*
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

TO: Jacqueline Hardy PM#34/Jose Gayoso
Regulatory Management Branch I
Antimicrobials Division (7510P)

Applicant: Rutgers Germany GMBH

CODE: (A570) Amendment; Non-Fast Track; Requiring Data Review;

DATE DUE: August 18, 2014

PRODUCT FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Coal Tar Creosote (AWPA P2)	98.0
<u>Inert Ingredient(s):</u>	<u>2.0</u>
Total:	100.0

BACKGROUND:

The consultant, Technology Sciences Group Inc., on behalf of the registrant, RUTGERS Germany GMBH, has submitted an amendment to add an unregistered alternate source of active ingredient on a new alternate formulation for an integrated end-use product, called Coal Tar Creosote P2. This product is used as a wood preservative and is for non-food use.

The product chemist reviewed the following documents:

1. Cover letter, dated March 28, 2014.
2. EPA Amendment Form (EPA Form 8570-1), dated March 28, 2014.
3. Proposed Confidential Statement of Formula (CSF) (EPA Form 8570-4), dated March 28, 2014.
4. Certification with Respect to Citation of Data, dated March 28, 2014.
5. Data Matrix (Confidential and Public versions, EPA Form 8570-35), dated March 28, 2014, 4 pages each).
- 6.

49346300	Rutgers Germany GmbH (2014) Submission of Product Chemistry Data in Support of the Amended Registration of Coal Tar Creosote P2. Transmittal of 1 Study.
49346301	Claes, J.; de Bock, T.; Boenigk, W.; et al. (2014) Product Chemistry of Coal Tar Creosote P2 - Group A - Rutgers Belgium N.V. Project Number: RUTGERS/20140326/1. Unpublished study prepared by Rutgers Germany GmbH. 36p.

FINDINGS:

1. Group A product chemistry data requirements applicable to end-use products have been met (see MRID# 49346301 and Data Matrix).
2. Group B product chemistry data requirements applicable to end-use products have been previously met (see Product Chemistry Review for 61470-G_D414014_Coal Tar Creosote P2, dated January 15, 2014) in the original registration of the product.
3. Product label, January 24, 2014 and Basic CSF, July 5, 2013 are used as references.
4. The nominal concentration of the active ingredient on Alternate CSF, dated March 28, 2014 is consistent with the product label.
5. All ingredients in this formulation are approved for use in pesticide formulations.
6. Certified limits of all the ingredients are within the EPA Standard Certified Limits.

CONCLUSION:

Group A Product Chemistry data requirements for the alternate active source have been met. Group B Product Chemistry data requirements for the said active source have been previously met in the original registration of the product (see Findings #2 above). Alternate CSF, dated March 28, 2014 is acceptable.